

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

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Joseph Roseme, ADA

Suffolk County District Attorney's Office
By e-mail

February 16, 2012

Re: Comm. v. [REDACTED] State Lab no. [REDACTED]

ADA Roseme,

Please find below the discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Boston Police
- 3) the inventory control card
- 4) the pharmaceutical analysis Sheet
- 5) the pharmacopeia reference, *Micromedex*
- 6) the gas chromatography/mass spectrometry (gc/ms) data

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Kate Corbett operated the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler".

Michael Lawler
Senior Chemist

Cc: Kate Corbett

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits (e.g. strychnine in MDMA)

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

Current Drug Trends – Multijurisdictional Drug Task Force Academy August 2009

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

DEA Special Testing Lab Seminar June 2011

Sigma-Aldrich LC/MS – New Applications Fall 2011

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Kate A. Corbett

Education

Bachelor of Science Degree, CHEMISTRY May 2003

MERRIMACK COLLEGE

Coursework included: Organic Chemistry, Inorganic Chemistry, Quantitative Analysis, Instrumental Analysis, Physical Chemistry, Physics, Calculus

Employment

Chemist II State Laboratory Institute (March 2008-Present)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance and trafficking substances to determine violation of the Massachusetts drug laws
- Responsible for the identification of pharmaceuticals to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation, microscopes and balances for forensic drug analysis

Chemist I State Laboratory Institute (2005-March 2008)

Massachusetts Department of Public Health

Drug Analysis Laboratory

- Responsible for the identification of substance to determine violation of the Massachusetts drug laws
- Operate analytical instrumentation for the purpose of performing forensic drug analysis
- Successfully completed an eight week training course in the analysis of drugs conducted by senior staff of the Department of Public Health, Drug Analysis Laboratory
- Appointed an assistant analyst for the Department of Public Health, Drug Analysis Laboratory in 2005

Research Associate (September 2003 – August 2005)

SENSOR TECHNOLOGIES, INC - Shrewsbury, MA

- Prepared chemistries used in making sensor beads
- Generated and examined sensors employing fluorescence spectroscopy
- Performed protein, dye and sugar assays using UV/VIS spectrophotometry
- Carried out titrations on ricin using fluorescence correlation spectroscopy
- Statistical analysis of experimental data

Intern (March 2003 – August 2003)

MASSACHUSETTS STATE POLICE CRIME LABORATORY - Sudbury, MA

- Assisted in the gathering of case files to fulfill the National Institute of Justice's No Suspect Backlog Reduction Grant
- Observed in the Evidence, Criminalistics, DNA, Drug, Trace, Toxicology, and Bomb/Arson Units



DRUG RECEIPT

CC #

BOOK #

PAGE #

DESTRUCTION #

District/Unit

Name & Rank of Arresting Officer

PO Brendan Lyons / Michael Condon ID# 82917 / 93431

DEFENDANT'S NAME

ADDRESS

CITY

STATE

DESCRIPTION OF ITEMS SUBMITTED

GROSS
QUANTITY

GROSS
WEIGHT

LAB USE ONLY

ANALYSIS
NUMBER

1 pill bottle of clonazepam

49 pills

22.89g

To be completed by ECU personnel only

Name and Rank of Submitting Officer

ID#

Received by

Date

ECU Control #

No. [REDACTED]
City: Boston D.C.U. Police Dept.
Officer: P.O. Diana Lopez
Def: [REDACTED]

Date Analyzed: 1/12/12

Amount: 49.0
No. Cont: 1 Cont: pc

Subst: TAB

Date Rec'd: 11/14/2011

Gross Wt.: 22.89 ✓

No. Analyzed: 2

Net Weight: 8.14g

Tests: 1/12/12

2 Inj tabs to test



Prelim: clonazepam

Findings:

Clonazepam

Pharmaceutical Analysis Sheet

12-17
11

Sample [redacted] City Boston MA E.O. weight 22.89g
Count 49 tablets Description: Rx bottle
Ballistic I.D. clonazepam 1mg   net wt = 8.1422g
I.D. Source Micromedex green
Final I.D. clonazepam MS chemist KAC completed 1/12/12

Drug Information

DRUG NAME: CLONAZEPAM

INGREDIENTS: CLONAZEPAM -- 1 MG

Color: Green

Shape: Circle

Imprint: 833 This tablet is debossed with 833 above the scored line and TEVA on the unscored side, TEVA

Form: Oral Tablet

Available-Container-Size: Bottle of 100 , Bottle of 1000 , Bottle of 500

AAPCC Code: 007000 -
Benzodiazepines

NDC: 00093-0833-93

00093-0833-10

00093-0833-05

00093-0833-01

Excipients: Lactose
(Monohydrate) ; Magnesium
Stearate ; Cellulose,
Microcrystalline ; Povidone ; Water,
Purified ; Starch, Corn ; D&C Yellow No.
10 Aluminum Lake ; FD&C Blue No. 1
Aluminum Lake

Regulatory Status: Schedule IV

Availability: United States

Product ID 7150694

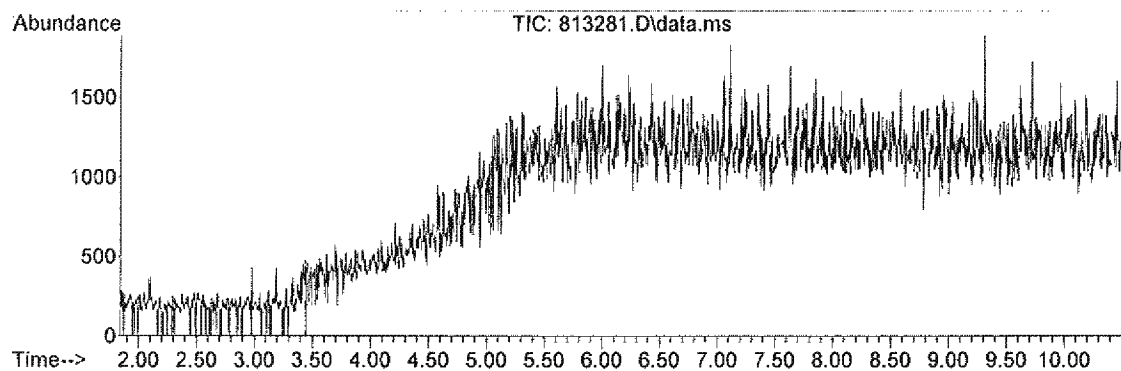
Contact: Teva Pharmaceuticals

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✓KAC
2/15/12

Information from Data File:

File Name : J:\01_11_12\813281.D
Operator : KAC
Date Acquired : 12 Jan 2012 6:53
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

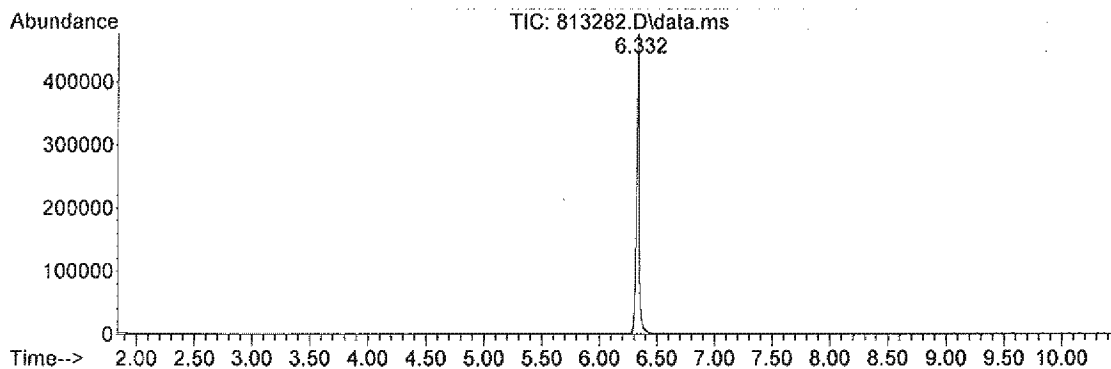


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\01_11_12\813282.D
Operator : KAC
Date Acquired : 12 Jan 2012 7:06
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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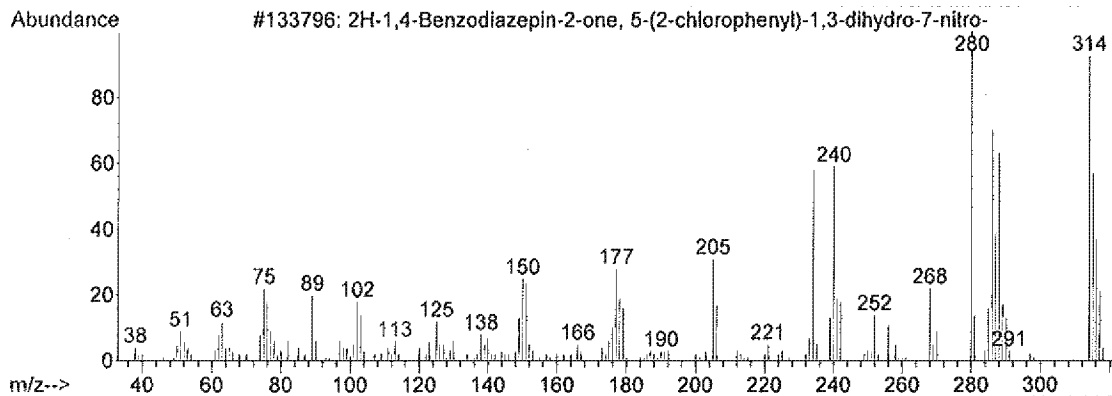
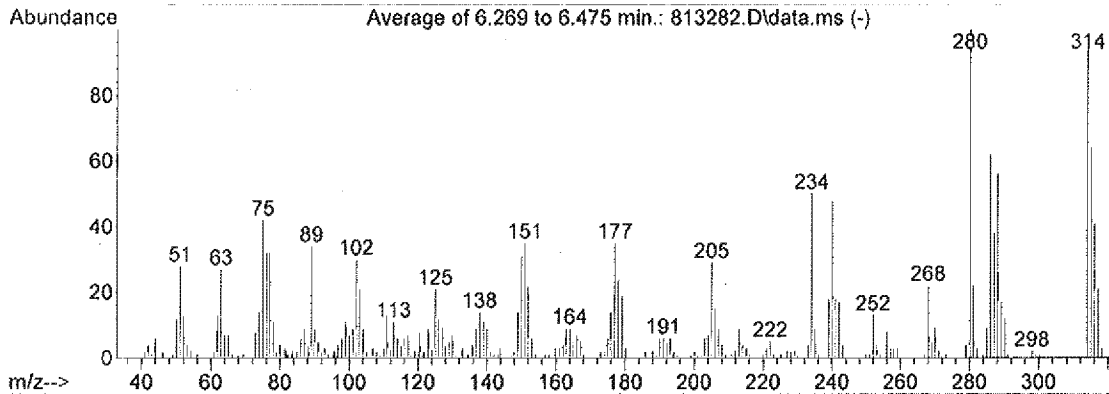
6.332	785213	100.00	100.00
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Information from Data File:

File Name : J:\01_11_12\813282.D
Operator : KAC
Date Acquired : 12 Jan 2012 7:06
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE

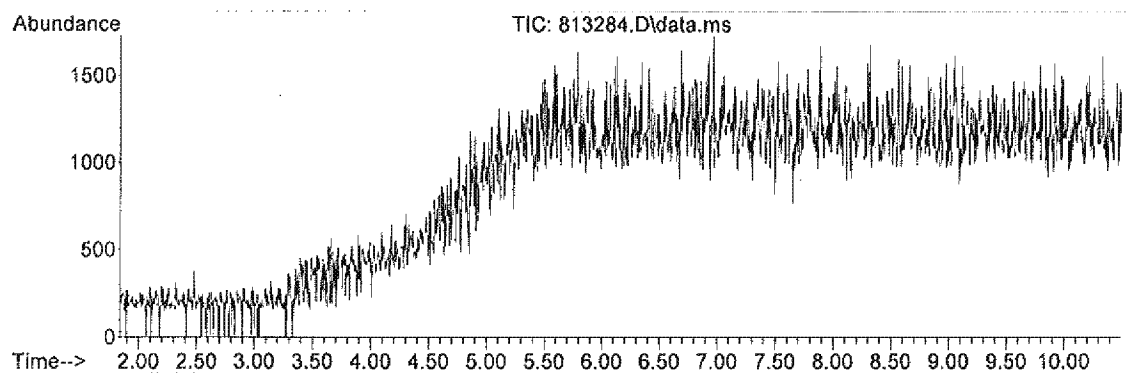
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92



Information from Data File:

File Name : J:\01_11_12\813284.D
Operator : KAC
Date Acquired : 12 Jan 2012 7:32
Sample Name : BLANK
Submitted by : MGL
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

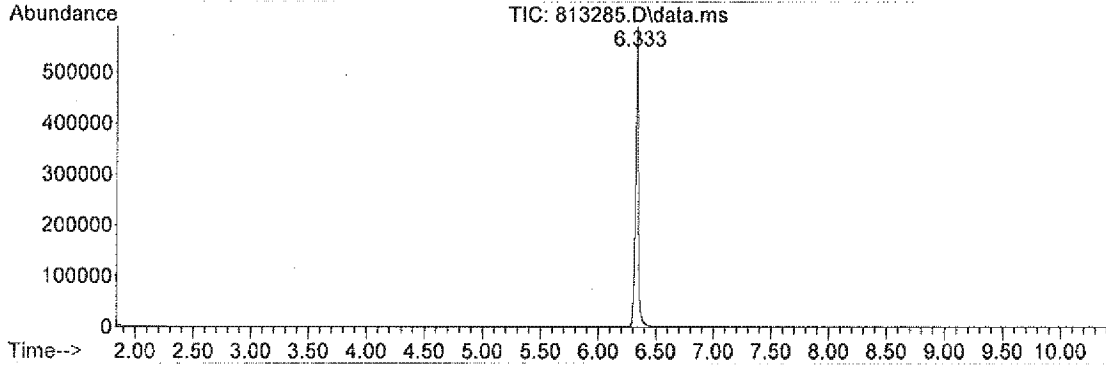


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\01_11_12\813285.D
 Operator : KAC
 Date Acquired : 12 Jan 2012 7:45
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 85
 AcquisitionMeth: CLONAZ.M
 Integrator : RTE



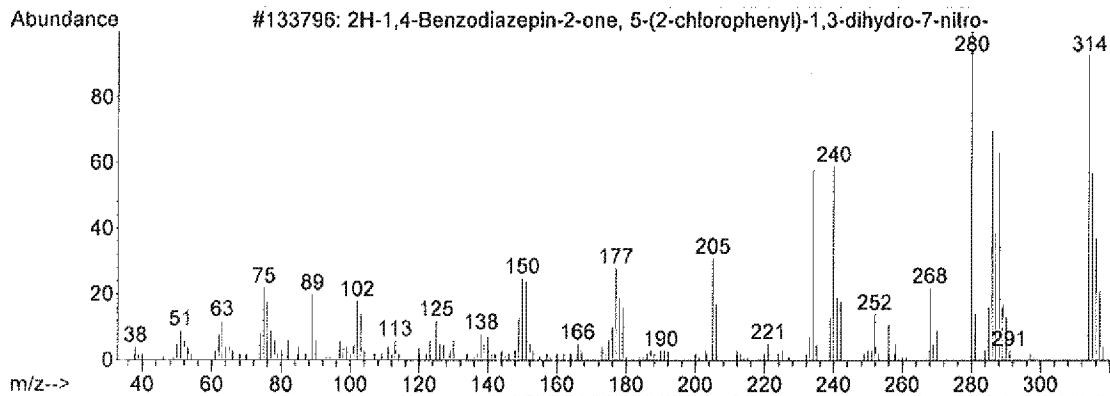
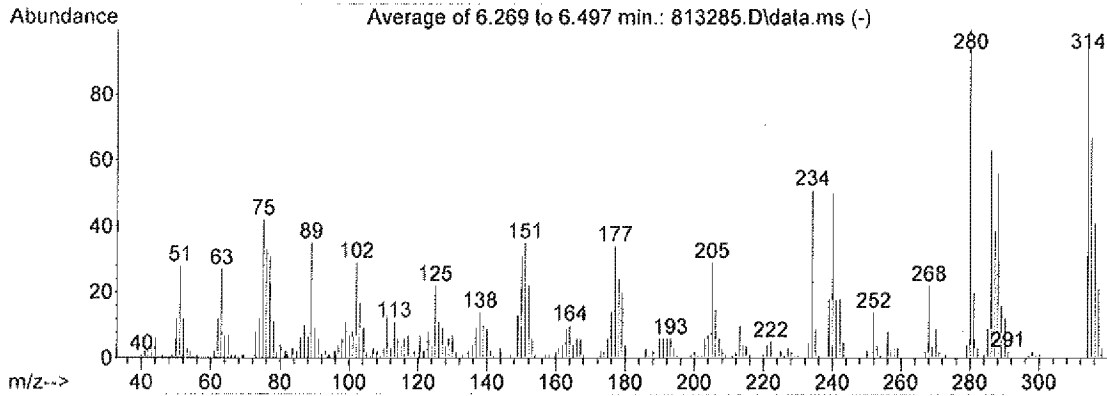
Ret. Time	Area	Area %	Ratio %
6.333	1008612	100.00	100.00

Information from Data File:

File Name : J:\01_11_12\813285.D
Operator : KAC
Date Acquired : 12 Jan 2012 7:45
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 85
AcquisitionMeth: CLONAZ.M
Integrator : RTE

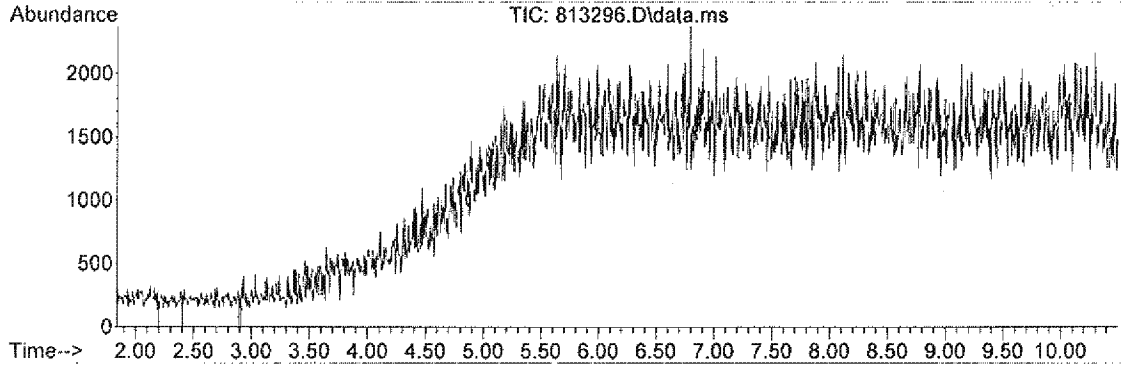
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	92



Information from Data File:

File Name : J:\01_11_12\813296.D
Operator : KAC
Date Acquired : 12 Jan 2012 10:09
Sample Name : BLANK
Submitted by :
Vial Number : 2
AcquisitionMeth: CLONAZ.M
Integrator : RTE

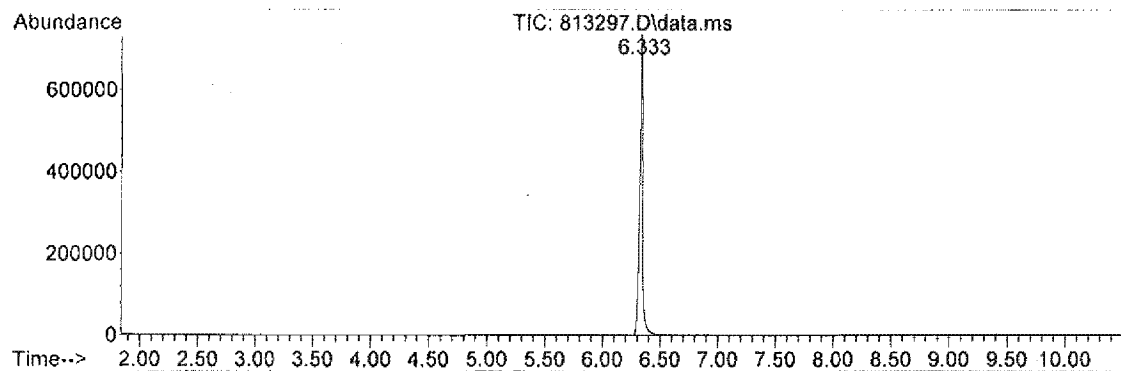


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : J:\01_11_12\813297.D
Operator : KAC
Date Acquired : 12 Jan 2012 10:22
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE



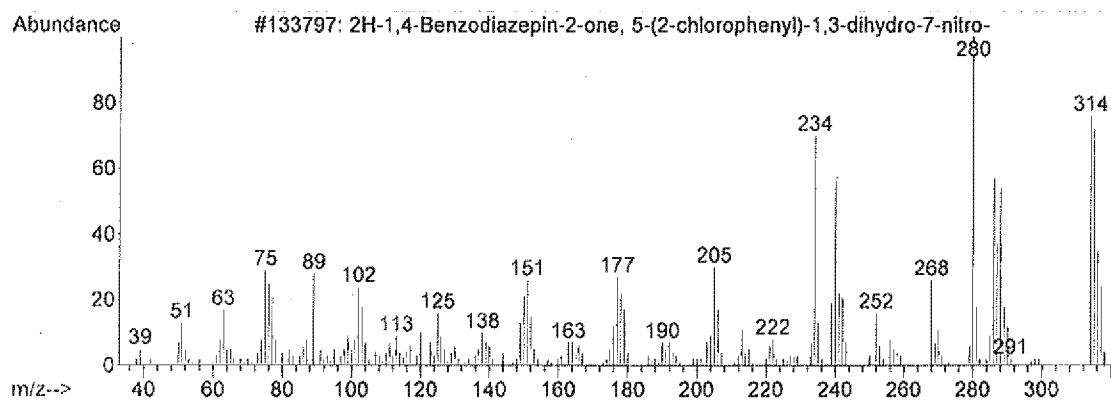
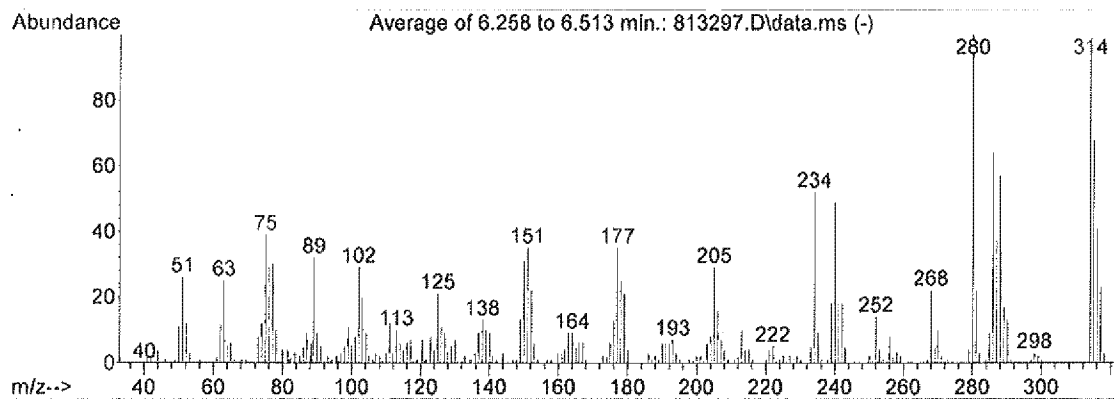
Ret. Time	Area	Area %	Ratio %
6.333	1345961	100.00	100.00

Information from Data File:

File Name : J:\01_11_12\813297.D
Operator : KAC
Date Acquired : 12 Jan 2012 10:22
Sample Name : CLONAZEPAM STD
Submitted by :
Vial Number : 82
AcquisitionMeth: CLONAZ.M
Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	6.33	C:\Database\NIST05a.L		
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99
		2H-1,4-Benzodiazepin-2-one, 5-(2-ch	001622-61-3	99



Last page.....no further data